

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS – EASTERN DIVISION**

In re: Timothy J. Kilroy,  
Debtor

Chapter 13  
Case No. 18-12764

**DEBTOR, TIMOTHY J. KILROY'S THIRD MOTION TO EXTEND TIME TO FILE  
CHAPTER 13 SCHEDULES AND DOCUMENTS**

Pursuant to MLBR 13-2(b) and MBLR 1007-1(g), the debtor Timothy J. Kilroy ("Debtor"), by and through his undersigned counsel, hereby moves this Honorable Court for an extension of ten (10) days to file his: Attorney Disclosure Statement, Chapter 13 Plan, Schedules A/B-J, Statement of Financial Affairs, Summary of Assets and Liabilities, 13 Agreement and Chapter 13 Statement of Your Current Monthly income and Calculation of Commitment Period Form 122C-1, **currently due on August 22, 2018**, by Court Order [Doc. No's. 7 & 20]. The new due date would be on **August 28, 2018**. Previously Debtor filed his Second Motion to Extend Time to File Chapter 13 Schedules and Documents (*See* Doc. No. 15), but due to a scrivener's error, the motion was erroneously titled "Debtor, Timothy J. Kilroy's First Motion to Extend Time To File Amended Chapter 13 Plan". The scrivener's error was the "Amended Chapter 13 Plan" instead should have been "Chapter 13 Schedules and Documents". Accordingly, this is Debtor's Third Motion to Extend Time To File Chapter 13 Schedules And Documents. As grounds for this Motion, Debtor states the following:

1. Debtor filed his Voluntary Petition for Individuals Filing for Bankruptcy ("Voluntary Petition"), Debtor's Signature Page, Attorney's Signature Page and Declaration regarding Electronic Filing in relation to her Voluntary Petition, SSN/Tax ID, Creditor Matrix and Verification of Creditor Matrix, on July 19, 2018.

2. Pursuant to this Court's Order dated July 20, 2018, Debtor is required to file his Attorney Disclosure Statement, Chapter 13 Plan, Schedules A/B-J, Statement of Financial Affairs, Summary of Assets and Liabilities, 13 Agreement and Chapter 13 of Your Current Monthly Income and Calculation of Commitment Period Form 122C-1, and Evidence of Current and Sufficient Liability and Property Insurance, on or before August 3, 2018.

3. Debtor filed his First Motion to Extend on August 2, 2010, as more time was needed to finalized the above-referenced documents for filing.

4. Debtor filed Evidence of Current and Sufficient Liability and Property Insurance on or about August 9, 2018.

5. Additional time is still needed as Mr. Kilroy is not engaged in a traditional employ/employer relationship - he works for himself and his income is based off contracts that are constantly subject to change - and in order to provide accurate financial information, Mr. Kilroy and his counsel require an additional ten (10) days to file the above-referenced documents.

6. This is the third request for an extension and Debtor and counsel for Debtor do not anticipate requesting another extension to file the above-referenced documents.

7. The 341 creditors meeting is scheduled for September 5, 2018 and if the Court grants Debtor's extension request, the above-referenced documents will still be available two weeks in advance of the 341 Meeting, giving all parties ample time to prepare.

8. Lastly, no parties of interest or creditors will be prejudiced if the Court grants Debtor's extension.

**WHEREFORE**, Debtor prays this Court grant his motion to extend time to file the above referenced documents until August 28, 2018.

Respectfully submitted,

TIMOTHY J. KILROY

By his attorneys,

/s/ Robert Richardson  
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DATED: August 22, 2018

**CERTIFICATE OF SERVICE**

I certify that a copy of the following was served upon all interested parties via email using the Court's ECF system or via first class mail on or about August 22, 2018.

/s/ Robert Richardson  
Richardson (BBO No. 676947)

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